

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

JUSTINE HERCULES
3519 Kline Road
Rootstown, OH 44272
Plaintiff

vs.

TARGET CORPORATION
c/o Statutory Agent: CT Corporation
System
4400 Easton Commons Way
Suite 125
Columbus, OH 43219
Defendant

Case No.

Judge

COMPLAINT
(Jury Demand Endorsed Hereon)

Now comes Plaintiff, Justine Hercules, by and through counsel, and for her claims for relief states and alleges as follows:

1. At all times relevant herein, Justine Hercules ("Plaintiff"), is a resident at the above-captioned address in Summit County, Ohio.
2. At all times relevant, Defendant, Target Corporation, is a corporation duly licensed and authorized to do business in the State of Ohio and as such was doing business as a retail discount department store located at 4200 Kent Road, Stow, Summit County, Ohio, 44224.
3. This Court has both subject matter and personal jurisdiction over the parties.
4. On or about August 14, 2017, Plaintiff was a customer as a business invitee of Defendant's Stow store. As Plaintiff walked through the store, she slipped and fell on an unknown substance on the floor.
5. Plaintiff's fall was proximately caused by the negligence of the Defendant in failing to remove a dangerous and/or hazardous condition on the premises, and/or in failing to warn Plaintiff thereof.
6. At all times relevant, Defendant owed Plaintiff a duty to exercise ordinary care for Plaintiff's safety, the maintenance and upkeep of Defendant's premises in a



reasonably safe condition, and the obligation and duty not to create any dangerous and/or hazardous conditions upon Defendant's premises or permit them to exist.

7. Defendant's negligence in maintaining its premises and its failure to warn proximately caused Plaintiff to sustain serious and permanent personal injuries, including but not limited to Plaintiff's left knee.
 8. As a further result of this negligence and failure to warn, Plaintiff was forced to incur medical expenses in a yet to be determined amount and may be forced to incur additional medical expenses in the foreseeable future.
 9. As a further result of this negligence and failure to warn, Plaintiff was not allowed to continue to work at her job and eventually caused her to lose her job as she could not work. Plaintiff also endured additional losses such as her apartment and costs for transportation to medical appointments.
 10. Due to Defendant's negligence and failure to warn, Plaintiff has suffered personal injury losses in excess of Twenty-Five Thousand (\$25,000.00) Dollars.
- WHEREFORE, Plaintiff prays that she be awarded judgment against Defendant for compensatory damages in excess of \$25,000.00, plus interest, costs and attorney fees, and any other relief this Court deems reasonable.

A TRIAL BY JURY IS DEMANDED HEREIN.

Respectfully submitted,



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INSTRUCTIONS FOR SERVICE

TO THE CLERK: PLEASE SERVE THE DEFENDANT BY CERTIFIED MAIL AT THE ADDRESS SET FORTH IN THE CAPTION. SHOULD CERTIFIED MAIL BE RETURNED MARKED "UNCLAIMED" OR "REFUSED", PLEASE SERVE DEFENDANT AT THE SAME ADDRESS VIA REGULAR U.S. MAIL.

